

The Honorable John H. Chun
United States District Court Judge

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

Bianey GARCIA PEREZ, Maria
MARTINEZ CASTRO, J.M.Z., Alexander
MARTINEZ HERNANDEZ, on behalf of
themselves as individuals and on behalf of
others similarly situated,

Plaintiffs,

v.

U.S. CITIZENSHIP AND IMMIGRATION
SERVICES; Ur JADDOU, Director, U.S.
Citizenship and Immigration Services;
EXECUTIVE OFFICE FOR
IMMIGRATION REVIEW; David NEAL,
Director, Executive Office for Immigration
Review,

Defendants.

Case No. 2:22-cv-00806-JHC

**JOINT STATUS REPORT &
STIPULATION & ORDER**

Note on Calendar: September 13,
2023

PARTIES' JOINT STATUS REPORT AND STIPULATION

Plaintiffs Bianey Garcia Perez; Maria Martinez Castro; J.M.Z.; Alexander Martinez Hernandez; and Defendants U.S. Citizenship and Immigration Services ("USCIS"); Ur Jaddou, Director, USCIS; Executive Office for Immigration Review ("EOIR"); and David L. Neal, Director, EOIR, hereby stipulate to an additional 30-day stay of proceedings as the parties continue to draft a settlement agreement. On May 24, 2023, the parties reached an agreement in principle as to all claims and parties and are working toward finalizing the terms of the settlement agreement.

Plaintiffs and Defendants have previously jointly stipulated to several stays. *See* ECF Nos. 34, 37, 39, 41, 44, 46, 48, 51. Most recently, the parties jointly stipulated to a stay on August 17, 2023. On August 17, 2023, this Court granted the parties' stay and ordered the parties to submit a joint status report on September 13, 2023. Since that order, the parties have continued to make progress on finalizing a settlement agreement. On September 11, 2023, Defendants provided Plaintiffs with Defendants' edits to the settlement agreement to Plaintiffs. On September 12, 2023, Plaintiffs provided Defendants with Plaintiffs' feedback to Defendants' edits.

In light of these developments, the parties have agreed to stipulate to a 30-day stay of Defendants' briefing deadlines. Good cause continues to exist for the stipulation because the complexity of the issues in this case requires additional time and there continues to be a meaningful opportunity to reach a settlement that would conserve judicial resources, as well as those of the parties. The parties will file a final settlement agreement with the Court or seek a further extension, if necessary, by October 13, 2023.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

For the Plaintiffs:

For the Defendants:

STIPULATION - 2
2:22-cv-00806-JHC

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24 Dated this 13th day of September, 2023.

25 PURSUANT TO STIPULATION, IT IS SO ORDERED.

26 Dated this 25th day of September, 2023.

BRIAN M. BOYNTON

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U.S. Department of Justice, Civil Division

WILLIAM C. PEACHEY

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WILLIAM C. SILVIS

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The Honorable John H. Chun

UNITED STATES DISTRICT JUDGE

STIPULATION - 3

2:22-cv-00806-JHC

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